

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) **Criminal No. 23-cr-00070-JB**
)
)
CRAIG D. PERCIAVALLE)
JOSEPH A. RUNKEL)
WILLIAM O. ADAMS)

JOINT MOTION TO CONTINUE PRETRIAL CONFERENCE

Come now the Parties, the United States of America, and the Defendants, Craig Perciavalle, Joseph Runkel, and William Adams, by and through each parties' respective counsel, and hereby request that the pre-trial conference currently set on Friday, January 5, 2024 at 11:00 a.m. be continued until on or after Thursday, February 1, 2024.

Counsel for the parties have conferred and are of the view that the Court's time and potential assistance in resolving any issues will be better served by this continuance.

In addition, defense counsel have this date received preliminary calculations of the advisory sentencing guidelines and aver that counsel will review those preliminary calculations with their respective clients forthwith.

WHEREFORE, the parties jointly request this pretrial conference be continued until Thursday, February 1, 2024, or such other time as the Court may direct.

Respectfully submitted this 3rd day of January, 2024.

SEAN P. COSTELLO
UNITED STATES ATTORNEY

By: /s/ Christopher J. Bodnar
Christopher J. Bodnar
Assistant United States Attorney
United States Attorney's Office for the
Southern District of Alabama
60 South Royal Street, Suite 600
Mobile, Alabama 36602

GLENN S. LEON
CHIEF, FRAUD SECTION

By: /s/ Kyle C. Hankey
Kyle C. Hankey, Assistant Chief
Christopher D. Jackson, Acting Assistant
Chief
Laura Connelly, Trial Attorney
Fraud Section
1400 New York Avenue, NW
Washington, D.C. 20005
Telephone: (202) 514-2000
Facsimile: (202) 514-0142

s/ James R. Sturdivant

James R. Sturdivant

DENTONS SIROTE PC

2311 Highland Avenue South

Post Office Box 55727

Birmingham, AL 35255-5727

Tel: 205-930-5427; Fax: 205-930-5101

jim.sturdivant@dentons.com

alyse.windsor@dentons.com

Counsel for Defendant Joseph A. Runkel

s/ Jack W. Selden

Jack W. Selden

Bradley Arant Boult Cummings LLP

One Federal Place

1819 Fifth Avenue North

Birmingham, Alabama 35203

Tel: 205-521-8000; Fax: 205-521-8800

jselden@bradley.com

Counsel for Defendant Craig D. Perciavalle

s/ Fred Helmsing

Fred Helmsing

Mcdowell Knight Roedder & Sledge, LLC

11 North Water Street, 13th Floor

Post Office Box 350 (36601)

Mobile, Alabama 36602

Tel: 251-432-5300; Fax: 251-432-5303

fhelmsing@mcdowellknight.com

Counsel for Defendant William Adams

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2024, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/ James R. Sturdivant
OF COUNSEL